

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: **PAUL HRYWNAK, JR.,** aka : Chapter 13
Paul Hrywnak, : Case No. 5:23-bk-02348-MJC
Debtor(s), :

PAUL HRYWNAK, JR., :
Movant(s), : Motion to
vs. : Extend Automatic Stay
DEUTSCHE BANK NATIONAL TRUST :
COMPANY, as Trustee, in trust for registered :
Holders of Long Beach Mortgage Loan :
Trust 2005-WL2, Asset-Backed Certificates, :
Series 2005-WL2, **SELECT PORTFOLIO** :
SERVICING, U.S. INTERNAL REVENUE :
SERVICE, PA DEPARTMENT OF REVENUE :
And all parties listed on the mailing matrix :
filed with the Clerk, :
Respondent(s). :
:

**AFFIDAVIT OF DEBTOR
IN SUPPORT OF MOTION TO EXTEND AUTOMATIC STAY**

I, **PAUL HRYWNAK, JR.**, hereby swear and affirm, under penalty of perjury, that the following is true and correct:

1. I filed multiple prior bankruptcy cases, but only one, filed on June 9, 2022, docketed with this Court as **5:22-bk-01083** (the “Prior Case”) was pending within the last year.
2. I filed the Prior Case to save my residence from foreclosure, assert a related title insurance claim and address priority and secured taxes due.
3. The Prior Case failed for several reasons, but primarily due to the expense of having many years of tax returns prepared, loss of my driver’s license and related transportation expenses, two extensive periods of hospitalization and the related entire elimination of my income for the duration of hospitalization.
4. Since the Prior Case ended, I have recovered mobility and nearly completely recovered from a rare blood disease that caused my earliest bankruptcy case.
5. Since the Prior Case ended, I have remained in contact with my account, so as to be able to ensure that all tax documents are filed.
6. Significantly, I am also near recovering my drivers’ license, which should enable better communication with my attorney and enable me to attend hearings.
7. I reviewed and executed all documents required to be filed in this Bankruptcy Case.

8. I have also obtained regular construction work, which increased my income and expenses as listed on my Schedules I and J, though not as high as my Statement of Current Monthly Income indicates, as that does not include the slow winter months.

9. I am not simply attempting to postpone a Sheriff's Sale, and in good faith believe that I can save my residence once the impact of a title insurance claim due my residence being partially on real property that I do not own is resolved.

10. I also believe that once I have ensure that all tax documents are filed, I will be left with priority and secured tax claims that are difficult to deal with, though not impossible if my income returns to where it was prior to 2014.

Dated: November 5, 2023

/s/ Paul Hrywnak, Jr.
PAUL HRYWNAK, JR., Debtor